Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the Record 1 of 1
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List A B C D E

I would like to respond to several questions put forth in your recent pro=
posal for part 97 rule changes. I would also like to comment on sections =
in which no specific questions were raised in the formal proposal, but wh=
ich I feel should be emphasized.

In part IV, section A, paragraph 11 the FCC proposes a reduction from the=
 present six license classes to four classes. I would like to suggest tha=
t this change will be nothing more than a "stop gap" measure. Any number =
of license classes greater than three is excessive. An entry level class =
(novice), an intermediate class (general), and an advanced class (extra o=
r advanced) fully meets the needs and requirements of the amateur communi=
tee. If the FCC is prepared to expend public funds reorganizing the amate=
ur service, then a reasonably bold step is in order.

In part IV, section E, paragraphs 19 through 24 the formal proposal sugge=
st that the multiple steps in code testing should be reduced. I aggree, b=
ut I would suggest that the entry level class have no code requirements a=
nd that a code test for the advanced and intermediate level licensee cons=
ist of one minute solid copy at 10 wpm out of five minutes sent. This typ=
e of test fully meets present and near term requirements for both interna=
tional regulation and actual amateur practice. I would like to discuss t=
his point in greater detail.

Most amateur communication is carried out over paths which allow high sig=
nal levels. Under this condition, both voice and automatic decoding of di=
gital signals is easily accomplished today. Some amateurs, however, prefe=
r to pursue methods of communication that result in very low signal level=
s at the receiver. Under this condition, affordable computers are not yet=
 able to provide low error automatic decoding of the signals. Nor are the=
 signals of sufficient level to allow conventional human voice communicat=
ion. Under this latter condition, human interrpreted code transmission is=
 still able to provide a lower error link than other forms. I would sugge=
st that this will remain the case for five to ten years. It should no lon=
ger be the case when the typical hobbyist can buy a PC with processing po=
wer 100 times that available today. When conditions are such that human i=
nterrpreted code is the only way to complete the communication, actual pr=
actice dictates that very slow transmission rates be used. Typically 5to1=
0 wpm allows completion of contact, greater speeds under these conditions=
 typically fail.

In part IV, section E, paragraph 25 the proposal has been made to elimina=
te the exemption from code exam due to disability. I wholeheartedly suppo=
rt this proposal.

In part IV, section F, paragraphs 26 through 27, the proposal discusses w=
ritten test changes. I would like to suggest that the amateur communitee =
must become better versed in the (technical) theory and application of mo=
dern communications modes in order to fully participate in the developmen=
t, and even operation of equipment using these modes of communication. T=
o this end I would suggest that the advanced class licensee demonstrate a=
 mastery consistent with the "advance" or "extra" title, something the pr=
esent tests do not accomplish. A 100 question test covering todays Extra =
class material plus significant additions beyond the present material wou=
ld best demonstrate the suggested mastery. Additional topics may include =
modern communication modes (CD, TD, FD multiple access), conventional (na=
rrowband) terrestrial and spaceborne communications modes, and more detai=
led system/circuit applications relevant to those modes. The intermediate=

class test would consist of a 100 question written test covering materia=
l similiar to todays General AND Advanced class amateur written tests. Th=
e entry level written test would consist of a fifty question written test=
 focusing on operating procedures and basic applications much as a combin=
ation of todays Novice and Technition class written test. In each case, t=
he prospective licensee would best be served by being asked to demonstrat=
e mastery beyond rote memorization of a large percentage of some prepubli=
shed question pool. If multiple choice is the preferred type of test, do =
not prepublish the specific questions. Greater use of schematics and func=
tional block diagrams would also force the development of a more thorough=
 understanding of the operation of communication hardware AND increasingl=
y important control software.

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